

**SUPPORT SB-283**

Senator Doyle, Representative Walker, and members of the Human Services Committee,

**This testimony is in support of Raised Bill No. 283, an act concerning audits by the Department of Social Services.**

This bill's amendments address some of the concerns remaining with the fairness of DSS compliance audits of provider agencies in the Connecticut Home Care Program for Elders. Despite recent improvements made to the process, there are still areas of the audits that should be corrected and/or clarified. First and foremost, provider agencies should be given the guidelines by which the Department of Social Services conducts its audits and sampling methodologies, as stated in section 1.

In section 2, the audit would be limited to services performed during the two-year period up to notification of the audit or 200 claims, whichever is less. Currently, all companies, no matter their size, are audited with 100 claims as the random sample. A sampling of 100 claims is not statistically relevant across all agencies and therefore unfair to the larger companies when error rates are applied. To go a step further and still keep the math easy to apply, a suggestion would be to have a graduated sampling system, such as 100 samples for companies' under \$1 million in total population for a two-year period; 200 samples for \$2 million, and so on.

In section 3, this legislation seeks to limit extrapolation projections to only those claims that result in a financial finding, not a clerical error. A missing checkmark or a wrong day of the week on a time/activity sheet should not be considered a willful violation of program rules and providers should not be subjected to a financial consequence. Extrapolation should only be used if the findings resulted in an overpayment, i.e. paid for work not delivered, or underpayment to a provider.

Also, a provider aggrieved by the decision should have the right to appeal to a third party. In Section 9, the designee of the DSS will not just preside over the review, but can render a decision. This is important for the outcome to be determined by an impartial person.

While audits are necessary for the integrity of the program, these provisions ensure the state's vendors have the right to due process and you should approve these amendments.

**Sincerely yours,**

**Eileen H. Adams**

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**Also a member of the Connecticut Homemaker & Companion Association**